

DATE: May 17, 2004

TO: Federal Communications Commission
FROM: i wireless, 11358 Aurora Avenue, Urbandale, IA 50322
CC: Michael Haskins
RE: WT Docket No. 01-309 and RM 8658.
Filing of Reports on Hearing Aid Compatible Handsets

This communication should serve as i wireless' report on wireless carriers efforts toward compliance with the FCC's rules regarding the offering of hearing aid compatible handsets to customers.

The phones referenced below as **digital TTY/TDD, were tested** by the handset manufacturer Nokia and Motorola. Nokia and Motorola development/manufacturing **labs were responsible for testing** and ensuring the digital TTY/TDD compliance of each product. Compatibility for each phone is listed as "Digital TTY/TDD" compliant. The following **handset models are digital TTY/TDD compliant** according to the manufacturer of those products. Models are: Nokia 3595, 3590, 7250, 6340i, 3600, 3620 and Motorola T720, V400, V600.

Nokia representatives participate in the Alliance for Telecommunications Industry Solutions (ATIS) Working Group 4 incubator to address and revise standards related to hearing aid compatibility (HAC). In the interim, testing is proceeding according to the current version of the ANSI C63.19 standard. **Labeling and customer documentation** language and determination of consumer preferences, understanding, and industries (wireless and hearing aid) consistencies are in progress. Nokia is also a member of ATIS Working Group 6, which is addressing labeling and educational insert language issues. Consistency with hearing aid industry labeling is important to provide consumers with a clear understanding of the expected performance of digital cell phones and hearing aids.

Nokia currently anticipates meeting the requirements set forth in the HAC Report and Order (In the Matter of Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible

Telephones, Report and Order, WT Docket No. 01-309, (2003)). While no phones are currently specifically designated as "hearing aid compatible" for retail, Development is underway for design that includes:

- RF-fields that meet the requirements of the Report and Order;
- Meeting production of standards-established audio band
- Magnetic field near the earpiece (desired signal for hearing aid);
- Audio band baseband emissions from printed wiring board and
- Battery that do not interfere with hearing aid.
- Studies and work ongoing include:
 - RF-emission testing
 - T-coil testing
 - Earpiece studies
 - Battery modification studies
 - External coil studies

Selections of digital TTY/TDD phones are available at all i wireless points of distribution. Over 61% of our handset line-up (as listed above) is digital TTY/TDD at this time. Additionally, Nokia handsets that allow for HAC with the loopset accessory, i wireless offers 78% of the lineup with some sort of a HAC solution.

The total numbers of digital TTY/TDD models offered by i wireless at of the time of the report is 8 and this number will increase, as newer handsets are manufactured and readily available. I wireless intends to meet all FCC requirements.